

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re: Juan Figueroa ) Case no. 19-03074  
Frances Zygmunt )  
 ) Chapter 13  
Debtors ) Judge: Lashonda A. Hunt  
)

**NOTICE OF MOTION AND CERTIFICATE OF SERVICE**

Juan Figueroa  
Frances Zygmunt  
1609 Amaryllis Dr  
Romeoville, IL 60446

John C Dent  
1000 S Hamilton #D  
Lockport, IL 60441

Please take notice that on Friday, April 2, 2021 at 10:00 am, a representative of this office shall appear before the Honorable Judge Lashonda A. Hunt, or any judge sitting in that judge's place, and present the Trustee's motion, a copy of which is attached.

**This motion will be presented and heard telephonically using AT & T Teleconference.** No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must call in to the hearing using the following information - **Toll Free Number: 1-888-557-8511; Access Code: 7490911.**

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtors by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on Thursday, March 4, 2021.

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

/s/ Carrie O'Donnell  
For: Glenn Stearns, Trustee

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## **MOTION TO DISMISS FOR FAILURE TO MAKE PLAN PAYMENTS**

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to Section 1307(c)(6), and in support thereof, states the following:

1. The debtors filed a petition under the Bankruptcy Code on February 06, 2019.
2. The debtor's plan was confirmed on May 03, 2019.

A Summary of the debtor's plan follows:

Monthly Payment: \$1,000.00 Last Payment Received: February 16, 2021

Amount Paid: \$7,200.00 Amount Delinquent: \$2,800.00

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtors with respect to the term of a confirmed plan, pursuant to Section 1307(c)(6).

Respectfully Submitted;

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888